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March 18, 2019

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Application of Duke Energy Carolinas, LLC for Adjustments in Electric Rate Schedules
And Tariffs and Request for an Accounting Order
Docket No. 2018-319-E

Dear Ms. Boyd:

Enclosed, please find the South Carolina Office of Regulatory Staff's Errata to the Direct Testimony of ANTHONY SANDONATO. This filing includes 1) an Errata detailing the changes to the testimony, and 2) replacement pages of the corrected testimony for ease of the Commission and other parties.

Please do not hesitate to contact me should you have any questions.

Yours Truly,

Jeffrey M. Nelson

Encl.

cc: Parties of Record (via E-mail)

1 Although the Energy Plan encourages utilities to bring major grid modernization
2 projects before the Commission, ORS recommends major grid modernization projects and
3 unique cost recovery strategies, such as those outlined by DEC in the GIP and subsequent
4 phase-in and MRP, should be considered in a proceeding separate from a general rate
5 proceeding. In the context of a general rate case, interested parties are not able to
6 adequately review and determine the benefits and costs of the GIP and the proposed
7 alternative cost recovery strategy because of the six-month statutory time limitation
8 specified in S.C. Code Ann. § 58-27-870(B). A separate proceeding promotes transparency
9 and allows interested stakeholders to participate in a process focused on the examination
10 of a comprehensive grid investment strategy.

11 The North Carolina Utilities Commission (“NCUC”) issued an Order in Docket E-
12 7 Sub 1146 which stated, “[f]or now, DEC should utilize existing proceedings, such as the
13 *Integrated Resource Planning and Smart Grid Technology Plan* docket, to inform the
14 Commission on and collaborate with stakeholders regarding grid modernization initiatives
15 and the potential cost recovery mechanisms for such initiatives.”³ ORS recommends the
16 Commission take a similar approach and encourage collaboration and planning to make
17 sure all grid investments and cost recovery is in the public interest.

18 ORS recommends the Commission not approve the GIP in this Docket and instead
19 instruct the Company to file a separate petition with the Commission for future
20 consideration.

³ NCUC Order pg. 19 #44

ERRATA SHEET FOR ANTHONY SANDONATO
ON BEHALF OF
THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF
DOCKET NO. 2018-319-E
IN RE: APPLICATION OF DUKE ENERGY CAROLINAS, LLC
FOR ADJUSTMENTS IN ELECTRIC RATE SCHEDULES AND TARIFFS
AND REQUEST FOR AN ACCOUNTING ORDER

The following changes are made to my Direct Testimony:

1. Page 7, Line 8: Changed "S.C. Code Ann. § 58-5-240(C)" to "S.C. Code Ann. § 58-27-870(B)"